

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

Harmond Timothy Ulmer

Case No. Case: 2:21-mj-30528
Judge: Unassigned,
Filed: 11-09-2021 At 06:05 PM
USA v. HARMOND TIMOTHY
ULMER (CMP)(MLW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 24, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section
18 U.S.C. § 922(g)(1)

Offense Description
Felon in possession of a firearm having traveled in interstate commerce

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: November 9, 2021

City and state: Detroit, Michigan



Complainant's signature

Task Force Agent Angela Bunch, A.T.F.

Printed name and title



Judge's signature

Hon. Anthony P. Patti, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Task Force Officer Angela Bunch, being duly sworn, do hereby state the following:

I. INTRODUCTION

1. I am a sworn member of the Detroit Police Department and have been for twenty-three years. Since 2013, I have been assigned to the Firearms Investigative Team with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”). I became a Task Force Officer with the ATF in May of 2014. I have a Bachelors of Applied Science. I have been involved in numerous investigations related to violations of federal firearm and narcotic laws.

2. This affidavit establishes probable cause that Harmond Timothy ULMER violated 18 U.S.C. § 922(g)(1), as a felon in possession of a firearm on September 24, 2021, in the Eastern District of Michigan. This affidavit does not include all of the information known to law enforcement related to this investigation.

II. PROBABLE CAUSE

3. On September 24, 2021, Detroit Police Officers Jacob Patterson, Michael Ayala, and Dillion Kenny were working scout car code TAC38. At approximately 18:50 hours, TAC38 was in the area of Lesure and Eaton,

approaching Chalfonte, in the City of Detroit. Officer Patterson observed ULMER exit the front driver seat of a black sedan that was parked on the east side of Lesure, facing northbound. Officer Kenny drove the patrol vehicle closer to ULMER, who began to walk towards the patrol vehicle. Officer Patterson observed the pistol grip of a handgun protruding from ULMER's front right pocket. Officer Patterson exited the patrol vehicle and asked ULMER if he had a CPL, but ULMER began to flee on foot.

4. Officer Patterson pursued after ULMER on foot westbound between the houses. During that time, Officer Patterson observed ULMER reaching into his front right pocket with his right hand. As Officer Patterson approached a tall fence, he observed ULMER retrieve a gold handgun from his front right pocket and throw it over the fence. Officer Patterson then observed ULMER jumping over the fence. Officer Patterson followed ULMER over the fence and began to run northbound in the backyard on Stansbury. As Officer Patterson continued to pursue ULMER, he observed him jump another fence and fall down. At that point Officer Patterson was able to place ULMER into handcuffs. Officer Patterson escorted ULMER to the patrol vehicle and began canvassing for the handgun that ULMER discarded. While canvassing, Officer Patterson advised Officer Ayala he located a magazine in the backyard through which

they originally ran. Officer Patterson later advised Officer Ayala that he located the handgun. Officer Ayala observed the black and gold handgun on the ground clear of any brush in a field on Stansbury. Officer Ayala then recovered the handgun in a vacant lot east of 14938 Stansbury Avenue. He made it safe by clearing the one live round inside.

5. Officer Ayala recovered a Black and Gold Glock 30 .45 caliber handgun, loaded with one (1) live round and placed it on evidence. A computerized search of the Law Enforcement Information Network (LEIN) determined that the firearm was stolen.

6. Officer Patterson recovered one (1) Black Glock Magazine containing nine (9) live rounds. The magazine and rounds were placed on evidence by Officer Patterson.

7. On September 24, 2021, a LEIN check was performed revealing ULMER did not have a valid Certified Pistol License (CPL). He was arrested for Carrying a Concealed Weapon.

8. On September 30, 2021, ATF Intelligence Research Specialist Paul Kadrovach determined based on ULMER's previous arrests, that ULMER, was a previously convicted felon, convicted of the following offenses:

2014 - 3rd Circuit Court, Detroit, Michigan: Count 1: Carrying Concealed

Weapon - Pleaded Guilty and sentenced to 9 months.

2015 – 3rd Circuit Court, Detroit, Michigan: Count 1: Felon in Possession of a Firearm – Pleaded Guilty and sentenced to 1 to 5 years.

9. ULMER's felony convictions were obtained by guilty plea. I am aware that the Michigan Court Rules require a court to directly advise a defendant of the maximum possible penalty before accepting a guilty plea. Therefore, probable cause exists that ULMER knew, at the time he possessed the firearm, he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year.

10. On October 27, 2021, Special Agent Michael Jacobs advised, based on a verbal description of the firearm, without physically examining the firearm, that the Glock 30 is considered a firearm as defined under 18 U.S.C. § 921, and that it was manufactured outside the State of Michigan and therefore had traveled through interstate and/or foreign commerce.

CONCLUSION

11. Probable cause exists that Harmond Timothy ULMER, a convicted felon, and knowing he was a convicted felon, did knowingly and intentionally possess a firearm, which traveled in and affected interstate commerce, in violation of Title 18 U.S.C. § 922(g)(1).



Angela Bunch
Task Force Officer, ATF

Sworn to before me and signed in my
presence and/or by electronic means



HON. ANTHONY P. PATTI November 9, 2021
United States Magistrate Judge